

Mr. Meek was scheduled for a presentence interview on Friday August 11, 2023 and undersigned counsel has been working with Mr. Meek to prepare for his upcoming sentencing. Mr. Meek has been assisting counsel in preparing for this sentencing, but has been forced to leave his property, including notes and other materials intended to assist defense counsel, at ADC.¹

Undersigned counsel has reached out to the government regarding its position on this matter, but has not received a response at the time of filing this motion.

For all of the foregoing reasons, given that Mr. Meek must meet with defense counsel to prepare for his upcoming sentencing, and to ensure that he has access to his medically required CPAP machine, we respectfully request that he be transported back to ADC pending sentencing.

Respectfully Submitted,

By: /s/ Eugene V. Gorokhov
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¹ Furthermore, based on information previously provided by Mr. Meek and his family, Mr. Meek requires a CPAP machine for sleep apnea, and is at high risk for heart attack without such a machine. When Mr. Meek was initially detained at ADC, he was not provided a CPAP machine. A CPAP machine was only provided after several days, after significant efforts by his family members. Undersigned counsel has not be able to determine whether this machine was sent to Northern Neck with Mr. Meek, or whether one will be available at that facility.

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document VIA ECF which provides a copy to the AUSA of record.

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